

ENVIRONMENTAL MANAGEMENT SITE-SPECIFIC ADVISORY BOARD

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Mr. Mark Whitney
Acting Assistant Secretary for Environmental Management
U.S. Department of Energy, EM-1
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Whitney:

Background

The Waste Isolation Pilot Plant (WIPP) was created to safely and reliably dispose of this waste, and did so from 1999 to February 2014. The Waste Isolation Pilot Plant (WIPP) has been operating since 1999 as the only underground repository for transuranic (TRU) waste disposal. Having the WIPP facility available for TRU waste disposal has been shown to be extremely important to the Department of Energy (DOE) as well as sites across the United States needing to safely and reliably dispose of TRU waste. WIPP operations on a continuing basis are critical to the success of the DOE Office of Environmental Management's (EM) waste disposal mission.

Observations and Comments

With the recent shutdown of WIPP, DOE efforts to complete programs for the shipment of TRU waste from sites needing this method of waste disposal have been jeopardized. The shutdown of WIPP has rendered these sites unable to complete commitments due to respective state consent orders or regulatory requirements. Planning for future shipments to WIPP is also now on hold with no effective time table of when shipments may be able to resume.

Exploring opportunities for additional TRU waste storage facilities at the various generator sites with limited lifetime expectancies is neither efficient nor cost effective. And while it does appear unwise to duplicate the permitting process at multiple sites, it is equally unwise to concentrate on just the one site that can truly facilitate permanent long-term disposal of TRU waste.

Intent

It is the intent of the EMSSAB to be assured that DOE accelerates and makes more transparent any activities in motion or planned that will resume the safe disposal of transuranic waste at WIPP and concurrently identify temporary safe storage locations for TRU waste.

Recommendation

To restore public confidence in its ability to safely manage TRU waste, meet its commitments to its state regulators, and minimize the risk to the public from the massive amounts of waste it currently has on hand, the EMSSAB recommends that DOE:

1. Create and make available to the EMSSAB and the public a realistic plan and timetable to restore WIPP to full operation. Resumption of safe WIPP operations should be the highest priority.
2. Given the possibility of another event, identify and evaluate safe alternatives to retaining waste at its point of generation until WIPP is restored to full operation.
3. Put the best of these alternatives into operation to deal with the current situation, and to be prepared in the event a similar situation arises in the future. Identification of the alternatives should include a quantitative evaluation of the financial and risk benefits and costs of the alternatives.

Summation

These actions need to be taken as soon as possible. To delay is to make a choice for distributing the risks associated with the temporary storage of nuclear waste at the generator sites around the nation, rather than being contained at a small number of sites such as Carlsbad, NM, Andrews, TX or other alternative sites.

Due to the difficulties that the shutdown of the WIPP has caused the various DOE facilities that must ship TRU waste, the Environmental Management Site-Specific Advisory Board recommends that DOE-EM Headquarters identify and evaluate potential above-ground temporary waste storage installation sites and conduct required environmental impact studies in an effort to prevent similar problems in the future

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cc: Kristen Ellis, EM-3.2
David Borak, EM-3.2